



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 11, 2022

By ECF

The Honorable Alison J. Nathan, Sitting by Designation
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government respectfully moves for the exclusion of time for Counts Seven and Eight under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), until June 28, 2022—the scheduled date of sentencing. Although the Government currently intends to move to dismiss these counts at sentencing, as it has previously stated (*see* Dkt. No. 574), the Government seeks this exclusion of time in an abundance of caution, so the Act does not preclude prosecution in the unlikely event an intervening development occurs between now and sentencing which causes the Government to reconsider that position. Such an exclusion promotes the ends of justice by obviating any need for the parties and the Court to prepare for a second trial which, barring unforeseen developments, will not occur. *See* 18 U.S.C. § 3161(h)(7)(A). Defense counsel consents to this exclusion.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____s/

Maurene Comey

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Cc: Defense Counsel (by ECF)